

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 06 CR _____
v.	)	
	)	Violations: Title 18, United States Code,
DANIEL SCHULTE	)	Section 2252A(a)(5)(B).
	)	

The UNITED STATES ATTORNEY charges:

On or about February 28, 2005, at Chicago, in the Northern District of Illinois, Eastern Division,

DANIEL SCHULTE,

defendant herein, knowingly possessed material, namely, one Maxtor hard drive, Model DiamondMax Plus 9, bearing serial number Y44KG73E, containing images of child pornography that had been produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means;

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

## FORFEITURE ALLEGATIONS

The UNITED STATES ATTORNEY further alleges:

1. The allegations contained in Count One of this Information are realleged and incorporated by reference as if fully restated here for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

2. As a result of his violation of Title 18, United States Code, Section 2252A(a)(5)(B),

DANIEL SCHULTE,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all right, title, and interest defendant has in any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforesaid violations.

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section 2253 include, but are not limited to, the following item: a Dell Inspiron laptop computer, bearing identification number CN-04T176-12961-279-5542, and a Maxtor hard drive, Model DiamondMax Plus 9, bearing serial number Y44KG73E, that were acquired from defendant on or about February 28, 2005.

4. To the extent that the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred to, sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property that cannot be subdivided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 18, United States Code, Section 2253(o);

All pursuant to Title 18, United States Code, Section 2253.

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UNITED STATES ATTORNEY